

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTSFILED
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TRISTAN LOGAN,)	U.S. DISTRICT COURT DISTRICT OF MASS.
Complainant,)	
v.)	C.A. No. 05-10045-GAO
ELAINE L. CHAO, Secretary,)	
United States Department of Labor)	
Defendant.)	

JOINT STATEMENT

Pursuant to Fed. R. Civ. P. 16(b) and Local Rule 16.1(D), the parties have conferred and hereby file the following Joint Statement and proposed pre-trial schedule in anticipation of the Scheduling Conference on December 8, 2005.

A. Discovery Plan

The parties propose that fact discovery close on June 15, 2006 and proceed as follows:

1. The parties will provide each other the Rule 26(a)(1) automatic discovery by December 8, 2005.
2. Fact discovery shall close on June 15, 2006 and shall be conducted in accordance with the Federal Rules of Civil Procedure and the Local Rules of this Court.
3. Should expert discovery be necessary, the plaintiff shall disclose his expert(s) and report(s) by June 20, 2006 and the defendant shall disclose its experts and reports by July 15, 2006. Expert depositions shall be completed by July 31, 2006.

B. Motion Schedule

1. All motions for summary judgment shall be filed by September 15, 2006.
2. All oppositions shall be filed by October 15, 2006.

C. Certifications

The parties will file Certificates in accordance with Local Rules 16.1(3) at or before the Scheduling Conference.

D. Magistrate Judge

At this time, the parties do not consent to trial before a Magistrate Judge.

Respectfully submitted,

For the plaintiff,


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For the defendant,

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Date: November 29, 2005